



Lexington Financial Center  
250 West Main Street, Suite 1600  
Lexington, Kentucky 40507-1746  
859.233.2012  
Fax: 859.259.0649

859.288.7423  
sconn@wyattfirm.com

December 1, 2003

*Steph Conn*  
**RECEIVED**

DEC 01 2003

PUBLIC SERVICE  
COMMISSION

**VIA HAND DELIVERY**

Mr. Thomas M. Dorman  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602

RE: An Inquiry Into the Development of Deaveraged Rates for  
Unbundled Network Elements, Administrative Case No. 382

Dear Mr. Dorman:

Enclosed for filing please find an original and eleven (11) copies of the  
Request for Extension of Time by Kentucky ALLTEL, Inc. Please return a date-  
stamped copy to me in the enclosed self-addressed stamped envelope.

Thank you for your cooperation in this matter. If you have any questions,  
please do not hesitate to call.

Sincerely,

WYATT, TARRANT & COMBS, LLP

Stephanie R. Conn  
Legal Secretary to James H. Newberry, Jr.

Enclosure

Request (original and 11 copies)  
SASE

cc: Mr. Steve Byars (w/enc.)  
Mr. John C. Bassett, III (w/enc.)  
Parties of Record

30312582.1

www.wyattfirm.com

250 West Main Street, Suite 1600  
Lexington, KY 40507-1746  
859.233.2012

918 State Street  
Bowling Green, KY 42101  
270.842.1050

1715 Aaron Brenner Drive, Suite 800  
Memphis, TN 38120-4367  
901.537.1000

500 West Jefferson Street, Suite 2800  
Louisville, KY 40202-2898  
502.589.5235

311 West Main Street  
Frankfort, KY 40601-1807  
502.223.2104

2525 West End Avenue, Suite 1500  
Nashville, TN 37203-1423  
615.244.0020

101 West Spring Street, Suite 500  
New Albany, IN 47150-3610  
812.945.3561

*L. Kirby*  
**RECEIVED**

**COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION**

DEC 01 2003

PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**AN INQUIRY INTO THE DEVELOPMENT )  
OF DEAVERAGED RATES FOR UNBUNDLED ) ADMINISTRATIVE  
NETWORK ELEMENTS ) CASE NO. 382**

**REQUEST FOR EXTENSION OF TIME BY KENTUCKY ALLTEL, INC.**

COMES NOW, Kentucky ALLTEL, Inc. ("Kentucky ALLTEL") requesting that the response deadline for submission of the proposed Unbundled Network Element rates with supporting documentation be extended for a period of 60 days until February 5, 2004. This request for extension is necessitated by the volume of requests for information in the numerous proceedings currently pending before the Public Service Commission and the actual time required to develop the requested data. Promptly upon receipt of the Commission's Order dated November 7, 2003, ALLTEL initiated the work in this matter and that work is in progress. However, in spite of the Company's best efforts, that work will not be completed in accordance with the deadline established in the above-referenced Order.

The cost study which Kentucky ALLTEL must prepare in order to provide the UNE rates will take approximately nine (9) weeks to prepare. Switching Cost development for the approximately 100 Kentucky ALLTEL exchanges will require, at a minimum, 35 days. This includes developing line and trunk data and forecasts for each exchange, inputting those results into the switching model, pricing out each switch and finally reviewing the outputs and incorporating those results into the UNE/TELRIC database. The Loop Cost component is anticipated to require another 45 days to develop.

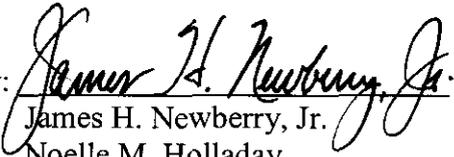
This schedule reflects the time required to download loop facilities and existing cable route data into the loop model. Additionally, significant time is required to re-size parallel cables, summarize for processing, identify and itemize interexchange cable facilities by route, convert feeder cable to fiber and re-price the rebuilt network at current prices. This schedule also considers review times, allowance for re-runs, time required to input loop material costs and programming into the UNE/TELRIC database. Adequate time must be allowed to incorporate company specific financial data, process the avoided cost and collocation models, develop and input the allocation factors and develop the UNE rates. Sufficient time for result analysis, review of the UNE rates and for making any required corrections must also be considered. Further, this process does not reflect the numerous discovery requests associated with the Commission's 90-Day Triennial Review Order ("TRO") Proceeding to which ALLTEL was obligated to comply as well as the 9-Month TRO Proceeding and the South East Telephone v. Kentucky ALLTEL, Inc. arbitration. Kentucky ALLTEL personnel with the knowledge necessary to perform the cost study are those also responsible for the multiple TRO proceedings currently underway in other states served by ALLTEL affiliates.

This extension will not unfairly delay this proceeding and is necessary to produce an accurate result.

WHEREFORE, Kentucky ALLTEL prays that the Commission grant its Request for an Extension of Time and all other necessary and proper relief to which Kentucky ALLTEL may be entitled. Dated this 1st day of December, 2003.

Respectfully submitted,

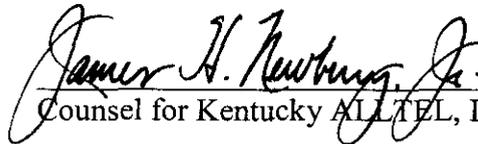
**KENTUCKY ALLTEL, INC.**

By: 

James H. Newberry, Jr.  
Noelle M. Holladay  
Wyatt, Tarrant & Combs, LLP  
Counsel for Kentucky ALLTEL, Inc.  
250 West Main Street, Suite 1600  
Lexington, KY 40507-1746  
Telephone: 859-233-2012  
Facsimile: 859-259-0649

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the individuals listed on the attached service list via regular U.S. mail postage prepaid this 1st day of December, 2003.

  
Counsel for Kentucky ALLTEL, Inc.

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Brenda Everette  
Burkesville Gas Company, Inc.  
119 Upper River Street  
P.O. Box 69  
Burkesville, KY 42717

Kirsten Grissom  
Administrative Manager  
Burkesville Gas Company  
2718 Wesley Street, Suite A  
Greenville, TX 75401-4121

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